

Mary Elizabeth Conn CBA #224597
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FILED

SEP 13 2007

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	CR 06-00621-JW
)	
Plaintiff,)	
vs.)	
)	STIPULATION TO MODIFY
)	CONDITIONS OF PROBATION AND
)	SUPERVISED RELEASE
)	
SEAN RIGSBY,)	
)	
Defendant.)	

TO THE HONORABLE JAMES WARE:

Defendant Sean Rigsby, through his counsel, Mary Elizabeth Conn, petitions the court to modify his conditions of probation and supervised release.

This Petition is based on the grounds that the Defendant's job requires that he travel throughout the State of California. The Defendant is currently employed by RHI Claim Support in Pleasanton, California as a surveillance investigator. The court's order contained the standard condition that, "The defendant shall not leave the judicial district without the permission of the court or probation officer." Defendant hereby requests that he be allowed to travel outside of the Northern District, but within the State of California, for employment related purposes.

1 Dated: September 11 2007

2 Respectfully submitted,
3 MARY E. CONN & ASSOCIATES

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5 Mary Elizabeth Conn,
6 Attorney for Defendant Sean Rigsby

7 Stipulated to by:

8 Jeff Nedrow - by permission
9 Jeff Nedrow, AUSA

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11
12 Janie Zhuang
13 Janie Zhuang, U.S. Probation Officer

14 IT IS SO ORDERED:

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17 Date:

18 September 13, 2007

19 James Ware
20 THE HONORABLE JAMES WARE
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UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF CALIFORNIA

USA

Plaintiff,

v.

SEAN RIGSBY

Defendant.

Case Number: CR06-00621 JW

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I am an employee in the Office of the Clerk, U.S. District Court, Northern District of California.

That on September 13, 2007, I SERVED a true and correct copy(ies) of the attached, by placing said copy(ies) in a postage paid envelope addressed to the person(s) hereinafter listed, by depositing said envelope in the U.S. Mail, or by placing said copy(ies) into an inter-office delivery receptacle located in the Clerk's office.

Jeffrey David Nedrow
United States Attorney's Office
NDCA, San Jose Division
150 Almaden Blvd., Suite 900
San Jose, CA 95113

Mary Elizabeth Conn
Attorney at Law
55 River Street Suite 100
Santa Cruz, CA 95060

Janie Zhuang
United States Probation Office
280 South First Street
San Jose CA 95113

Dated: September 13, 2007

Richard W. Wieking, Clerk


By: Elizabeth C. Garcia, Deputy Clerk